



**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JENNIFER MAZZARELLO

*

Plaintiff

*

v.

*

Civil Action No. AMD 02 CV 3576

LUCENT TECHNOLOGIES, INC.

*

Defendant

*

* * * * *

CONSENT MOTION FOR ENLARGEMENT OF TIME

Jennifer Mazzarello, Plaintiff, by and through her attorneys, Paul V. Bennett and James E. Zuna, Jr., hereby requests, pursuant to Federal Rules of Civil Procedure, Rule 6(b) and Local Rule 105.9, an enlargement of time in which to respond to Lucent Technologies, Inc., Defendant's, Motion for Summary Judgment and for cause states:

1. That Defendant filed on or about April 24, 2003 a Motion for Summary Judgment.
2. That, by counsel's calculation, Plaintiff's Response to Defendant's Motion for Summary Judgment is to be filed with this Court no later than May 12, 2003.
3. That Defendant's Motion for Summary Judgment is a 37-plus page document, not including exhibits, for which extensive research and preparation is required in order to provide a proper response.
4. Counsel for Plaintiff has been diligent in preparing a response to Defendant's Motion for Summary Judgment. However, given the volume of the motion and complexity of the issues raised, as well as time constraints related to other matters, Plaintiff requires additional time in which to properly respond to Defendant's Motion for Summary Judgment.
5. That counsel for Defendant does not object to an enlargement of time in which



Plaintiff shall respond to Defendant's Motion for summary Judgment no later than Monday, May 19, 2003.

WHEREFORE, Jennifer Mazzarello, Plaintiff, hereby requests that this Honorable Court grant an enlargement of time, and that Plaintiff be permitted to file her Response to Defendant's Motion for Summary Judgment no later than May 19, 2003.

Respectfully Submitted,

James E. Zuna, Jr., Esq.
Law Office of Paul V. Bennett
133 Defense Highway, Suite 209
Annapolis, Maryland 21401
(410) 974-6000
Federal Bar No: 15690

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this _____ day of May, 2003 that a copy of the foregoing Motion for Enlargement of Time was sent by facsimile and by first class mail, postage prepaid, to Robert R. Niccolini, Esquire, McGuire-Woods, LLP, 7 St. Paul Place, Suite 1000, Baltimore, Maryland 21202, Attorney for Defendant.

James E. Zuna, Jr., Esq.